

THE HONORABLE RICHARD A. JONES

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

BLACK LIVES MATTER SEATTLE-  
KING COUNTY, ABIE EKENEZAR,  
SHARON SAKAMOTO, MURACO  
KYASHNA-TOCHA, ALEXANDER  
WOLDEAB, NATHALIE GRAHAM,  
AND ALEXANDRA CHEN,

Plaintiffs,

v.

CITY OF SEATTLE,

Defendant.

No. 2:20-cv-00887-RAJ

DECLARATION OF STEPHEN LAGREE  
IN SUPPORT OF PLAINTIFFS' MOTION  
FOR CONTEMPT

I, Stephen Lagree, declare and state as follows:

1. The information contained in this declaration is true and correct to the best of my knowledge, and I am of majority age and competent to testify about the matters set forth herein.

2. I've lived in the Seattle for three years. I currently live in the Beacon Hill area. I am a software engineer.

3. Before Saturday, July 25, 2020, I participated in protests in Capitol Hill against police violence on several days, evenings, and nights in early June. I have never seen police violence like I experienced and witnessed when I participated in the protest on July 25, 2020. On that day, I was at the protest from approximately 3 p.m. to 7 p.m.



1           4.       On Saturday, July 25, 2020, around 5 p.m., I was near the front of the protest lines  
2 at Broadway and Pine. Along with others, I was chanting. Without any warning and without any  
3 order to disperse, police started using some kind of chemical gas and people started running. I  
4 stayed where I was because I had goggles on and I wasn't as impacted. Someone handed me a  
5 leaf blower and I used it to try to blow the gas away from protesters.

6           **5.       Then I got hit twice, extremely hard, by projectiles, one in each thigh. I**  
7 **couldn't tell what they were but they left huge tennis ball sized lacerations. I ran away to**  
8 **avoid getting hit again and stopped on the hill in the park by Seattle Central College. While**  
9 **checking my wounds, I got hit again in the back. This time, it was from further away so the**  
10 **impact wasn't as bad. I ran again to get further away.**

11          6.       My leg wounds hurt a lot and I had to sit down and get a street medic to check  
12 them out and dress them.

13          7.       Later, my thighs swelled a tremendous amount and turned black and blue. They  
14 swelled up even more the next day and are still very swollen today.

15          8.       I didn't seek additional care, but I consulted with my brother-in-law who is a  
16 medical doctor. After reviewing the photos, he told me how to care for the wounds, including  
17 what to look for that might indicate that I needed to go to urgent care or the emergency room.

18          9.       My injuries, sustained over a week ago, continue to cause me pain. I consider  
19 myself lucky, though. I've read about protesters in other cities who have been blinded or had  
20 their testicles ruptured by projectiles. A slight shift in aim and the injuries I sustained on my  
21 upper thighs could easily have hit me in a particularly sensitive area.

22          10.       True and correct photos taken on July 25, 2020, of my injuries are attached hereto  
23 as Exhibits A – E.

24          11.       True and correct photos taken on July 26, 2020, of my injuries are attached hereto  
25 as Exhibits F – H.  
26



13. True and correct photos taken on July 29, 2020, of my injuries are attached hereto as Exhibits K – M.

14. True and correct photos taken on Aug. 2, 2020, of my injuries are attached hereto as Exhibits N – O.

15. Since being injured, I have mostly stayed at home. I intend to rejoin the protests after I am sufficiently healed, though I am fearful of being injured again.

Executed this 3rd day of August 2020 at Seattle, Washington.

I declare under penalty of perjury under the laws of the United States and the State of Washington that the foregoing is true and correct.

By: Stephen Lagree  
STEPHEN LAGREE



# EXHIBIT A







# EXHIBIT B







# EXHIBIT C







# EXHIBIT D







# EXHIBIT E







# EXHIBIT F







# EXHIBIT G







# EXHIBIT H







# EXHIBIT I







# EXHIBIT J







# EXHIBIT K







# EXHIBIT L







# EXHIBIT M







# EXHIBIT N







# EXHIBIT O



